

**ORIGINAL**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
 :  
 LETIZIA MARTINEZ DE GONZALEZ, :  
 as administratrix and executrix of :  
 the Estate of Emilio Martinez Manautou, :  
 as Trustee of the Emilio Martinez Manautou :  
 Trust, and as Trustee of the EMM Trust, :

:  
 Plaintiff-Counterclaim Defendant, :  
 :

:  
 - against - :  
 :

UBS AG and UBS TRUSTEES LTD., :  
 :

:  
 Defendants-Counterclaim Plaintiff :  
 :

:  
 and :  
 :

UBS AG, :  
 :

:  
 Third-Party Plaintiff, :  
 :

:  
 - against - :  
 :

:  
 ROBERT J. REGER, JR. and :  
 THELEN, REID, BROWN, RAYSMAN & :  
 STEINER, LLP, :  
 :

:  
 Third-Party Defendants :  
 -----X

Case No. 07 Civ. 7462 (RJS)

**NOTICE OF MOTION FOR THE  
ADMISSION *PRO HAC VICE*  
OF MICHAEL T. LIFRAK**

PLEASE TAKE NOTICE that upon the attached Declaration of Angelina Nguyen dated January 16, 2008, and the exhibits annexed hereto, and the Declaration of Michael T. Lifrak dated January 16, 2008, in support of this motion, Third-Party Defendants Robert J. Reger, Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP, hereby move the Court, pursuant to Rule 1.3(c) of this Court's Local Rules, for an Order allowing the admission *pro hac vice* of Michael T. Lifrak, a member of Quinn Emanuel Urquhart Oliver & Hedges, LLP, 865 South Figueroa Street, 10th Floor, Los Angeles, CA 90017, telephone (213) 443-3000, to represent

JAN 16 2008

925-6354775

Robert J. Reger, Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP in this case in whole or in part as counsel.

A proposed Order admitting Michael T. Lifrak is attached hereto as Exhibit A.

DATED: New York, New York  
January 16, 2008

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

By   
Angelina Nguyen

51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212) 849-7000

Attorneys for Third-Party Defendants Robert J. Reger,  
Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff-Counterclaim Defendant,

- against -

UBS AG and UBS TRUSTEES LTD.,

Defendants-Counterclaim Plaintiff

and

UBS AG,

Third-Party Plaintiff,

- against -

ROBERT J. REGER, JR. and  
THELEN, REID, BROWN, RAYSMAN &  
STEINER, LLP,

Third-Party Defendants  
-----X

Case No. 07 Civ. 7462 (RJS)

**DECLARATION OF ANGELINA  
NGUYEN IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE*  
OF MICHAEL T. LIFRAK**

ANGELINA NGUYEN, under penalty of perjury, declares as follows pursuant to

28 U.S.C. § 1746:

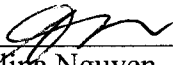
1. I am an associate with Quinn Emanuel Urquhart Oliver & Hedges, LLP, counsel for Third-Party Defendants Robert J. Reger, Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP. I make this declaration in support of Third-Party Defendants' motion to allow Michael T. Lifrak, a member of Quinn Emanuel Urquhart Oliver & Hedges, LLP, to appear in this matter *pro hac vice*.

2. I am a member in good standing of the Bar of the State of New York and a member of the Bar of this Court.

3. Michael T. Lifrak is a member in good standing in the Bar of the State of California. A Certificate of Good Standing confirming his status in California is attached hereto as Exhibit A. Mr. Lifrak has performed extensive legal work for Robert J. Reger, Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP related to the subject matter of this action and will meaningfully participate in the prosecution of this action.

Therefore, I respectfully request that Michael T. Lifrak be permitted to appear *pro hac vice* in this action.

Dated: New York, New York  
January 16, 2008

  
\_\_\_\_\_  
Angelina Nguyen  
angienguyen@quinnemanuel.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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as administratrix and executrix of  
the Estate of Emilio Martinez Manautou,  
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Plaintiff-Counterclaim Defendant,

- against -

UBS AG and UBS TRUSTEES LTD.,

Defendants-Counterclaim Plaintiff

and

UBS AG,

Third-Party Plaintiff,

- against -

ROBERT J. REGER, JR. and  
THELEN, REID, BROWN, RAYSMAN &  
STEINER, LLP,

Third-Party Defendants  
-----X

Case No. 07 Civ. 7462 (RJS)

**DECLARATION OF MICHAEL T.  
LIFRAK IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE***

I, MICHAEL T. LIFRAK, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Quinn Emanuel Urquhart Oliver & Hedges, LLP. I am fully familiar with the facts contained herein based upon my personal knowledge. I make this declaration in support of my application to be admitted *pro hac vice* in the captioned matter.

2. I am a member of the bar of the State of California.

3. I am a member in good standing in all jurisdictions where I have been admitted to practice.


4. I have never been held in contempt, nor have I been the subject of any disciplinary action by any court.

5. I have reviewed and am familiar with the Local Rules of the United States District Court for the Southern District of New York.

6. Based upon the foregoing, I respectfully request that I be admitted *pro hac vice* in the above matter.

I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: Los Angeles, California  
January \_\_, 2008

  
\_\_\_\_\_  
Michael T. Lifrak



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 8, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL TIMOTHY LIFRAK, #210846 was admitted to the practice of law in this state by the Supreme Court of California on December 5, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Defendants-Counterclaim Plaintiff :

and :

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Third-Party Defendants :  
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Case No. 07 Civ. 7462 (RJS)

**PROPOSED ORDER ADMITTING  
MICHAEL T. LIFRAK *PRO HAC VICE***

This matter having been presented to the Court, and upon reading and filing the Declaration of Angelina Nguyen, dated January 16, 2008 and the Declaration of Michael T. Lifrak, dated January 16, 2008 and the exhibits annexed thereto, it is hereby

ORDERED, that Michael T. Lifrak be and hereby is admitted to appear before this Court on behalf of Third-Party Defendants Robert J. Reger, Jr., and Thelen, Reid, Brown, Raysman & Steiner, LLP, on a *pro hac vice* basis, to argue or try this particular case in whole or in part as counsel or advocate.



Dated: \_\_\_\_\_

SO ORDERED:

\_\_\_\_\_  
U.S.D.J.

**CERTIFICATE OF SERVICE**

I, Angelina Nguyen, hereby certify that on January 16, 2008, I caused to be served copies of the foregoing Notice of Motion for the Admission *Pro Hac Vice* of Michael T. Lifrak; the Declarations in Support; and the Proposed Order upon the following counsel by electronic mail.

Mitchel H. Ochs, Esq.

Email: mochs@andersonochs.com

ANDERSON & OCHS, LLP

*Attorney for Plaintiff-Counter Defendant, Letizia Martinez De Gonzalez*

Robert S. Goodman, Esq.

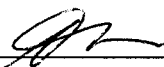
Email: rsgoodman@handlergoodman.com

HANDLER & GOODMAN LLP

*Attorney for Defendant-Third Party Plaintiff UBS AG*

Dated: January 16, 2008

New York, New York

  
\_\_\_\_\_  
Angelina Nguyen  
angienguyen@quinnemanuel.com